



COMMONWEALTH OF PENNSYLVANIA

January 3, 2025

**E-FILED**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Joint Application of Frontier Communications Parent, Inc., Commonwealth Telephone Enterprises LLC, Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company, Frontier Communications of Breezewood, LLC, Frontier Communications of Canton, LLC, Frontier Communications of Lakewood, LLC, Frontier Communications of Oswayo River LLC, Frontier Communications of Pennsylvania, LLC, Citizens Telecommunications Company of New York, Inc., CTSI, LLC d/b/a Frontier Communications CTSI, LLC, CTE Telecom, LLC, d/b/a Frontier Communications CTE Telecom Company, Frontier Communications of America, Inc. And Verizon Communications Inc., France Merger Sub Inc., For any Approvals Required Under the Public Utility Code for a Transfer of Control of Frontier Communications Parent, Inc. and its Pennsylvania subsidiaries to Verizon Communications Inc. / Docket Nos. A-2024-3051925, A-2024-3051926, A-2024-3051927, A-2024-3051929, A-2024-3051931, A-2024-3051932, A-2024-3051933, A-2024-3051934, A-2024-3051935, A-2024-3051936**

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Joint Application of Frontier</b>	<b>:</b>	<b>Docket No. A-2024-3051925</b>
<b>Communications Parent, Inc.,</b>	<b>:</b>	<b>A-2024-3051926</b>
<b>Commonwealth Telephone Enterprises</b>	<b>:</b>	<b>A-2024-3051927</b>
<b>LLC, Commonwealth Telephone</b>	<b>:</b>	<b>A-2024-3051929</b>
<b>Company LLC d/b/a Frontier</b>	<b>:</b>	<b>A-2024-3051931</b>
<b>Communications Commonwealth</b>	<b>:</b>	<b>A-2024-3051932</b>
<b>Telephone Company, Frontier</b>	<b>:</b>	<b>A-2024-3051933</b>
<b>Communications of Breezewood, LLC,</b>	<b>:</b>	<b>A-2024-3051934</b>
<b>Frontier Communications of Canton,</b>	<b>:</b>	<b>A-2024-3051935</b>
<b>LLC, Frontier Communications of</b>	<b>:</b>	<b>A-2024-3051936</b>
<b>Lakewood, LLC, Frontier</b>	<b>:</b>	
<b>Communications of Oswayo River LLC,</b>	<b>:</b>	
<b>Frontier Communications of</b>	<b>:</b>	
<b>Pennsylvania, LLC, Citizens</b>	<b>:</b>	
<b>Telecommunications Company of New</b>	<b>:</b>	
<b>York, Inc., CTSI, LLC d/b/a Frontier</b>	<b>:</b>	
<b>Communications CTSI, LLC, CTE</b>	<b>:</b>	
<b>Telecom, LLC, d/b/a Frontier</b>	<b>:</b>	
<b>Communications CTE Telecom</b>	<b>:</b>	
<b>Company, Frontier Communications of</b>	<b>:</b>	
<b>America, Inc. And Verizon</b>	<b>:</b>	
<b>Communications Inc., France Merger</b>	<b>:</b>	
<b>Sub Inc., For any Approvals Required</b>	<b>:</b>	
<b>Under the Public Utility Code for a</b>	<b>:</b>	
<b>Transfer of Control of Frontier</b>	<b>:</b>	
<b>Communications Parent, Inc. and its</b>	<b>:</b>	
<b>Pennsylvania subsidiaries to Verizon</b>	<b>:</b>	
<b>Communications Inc.</b>	<b>:</b>	

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**PREHEARING MEMORANDUM  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

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**I. INTRODUCTION**

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests

of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). To discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to these proceedings. Representing the OSBA in the above-referenced matter is Assistant Small Business Advocate Steven C. Gray. Please address all correspondence in that matter as follows:

Steven C. Gray, Esq.  
Senior Attorney  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

## **II. FILING BACKGROUND**

On October 31, 2024, the Joint Application of Frontier Parent, Inc. and its Regulated Subsidiaries and Verizon Communications Inc. for any Approvals Required under the Public Utility Code for a Transfer of Control (“*Joint Application*”) was filed with the Pennsylvania Public Utility Commission (“Commission”).

The Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention on November 26, 2024.

## **III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES**

At the time of this writing, the OSBA has not contracted an expert witness for this proceeding.

However, the OSBA fully participated in what is essentially an underlying docket to this proceeding, *Office of Consumer Advocate, Office of Small Business Advocate v. Commonwealth*

*Telephone Company, LLC d/b/a Frontier Communications Telephone Company*, Docket C-2023-3037574 (Order entered May 9, 2024).

In that proceeding, Administrative Law Judges (“ALJs”) Steven K. Haas and John M. Coogan, in their March 21, 2024, Initial Decision, fully documented the extensive problems that exist in the various Frontier service territories.

Furthermore, no party can reasonably contest the fitness of Verizon as a telecommunications company to assume ownership of the numerous Frontier companies.

Therefore, the OSBA submits that there is no need for a litigated proceeding to re-discover the obvious – that Frontier’s customers do not currently receive adequate, efficient, safe, and reasonable service, and that Verizon is fully capable of taking ownership of the Frontier companies.

If the *Joint Application* proceeds to litigation, the OSBA reserves the right to pursue any issue that may arise throughout the proceeding.

#### **IV. SERVICE OF DOCUMENTS**

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date<sup>1</sup> as satisfying the in-hand requirement.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

#### **V. SETTLEMENT**

The OSBA notes its willingness to enter settlement discussions at the appropriate phase of this proceeding.

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<sup>1</sup> In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

**VI. HEARING AND BRIEFING SCHEDULE**

At the time of this writing the parties are discussing a proposed procedural schedule. As set forth above, the OSBA believes that in the interest of Frontier's customers, as well as the requirements of judicial economy, the *Joint Application* should not be subject to a litigated proceeding and should be expeditiously approved by the Commission.

Respectfully submitted,

*/s/ Steven C. Gray*

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Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID # 77538

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

Dated: January 3, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Joint Application of Frontier</b>	<b>:</b>	<b>Docket No. A-2024-3051925</b>
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<b>Communications CTE Telecom</b>	<b>:</b>	
<b>Company, Frontier Communications of</b>	<b>:</b>	
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<b>Communications Parent, Inc. and its</b>	<b>:</b>	
<b>Pennsylvania subsidiaries to Verizon</b>	<b>:</b>	
<b>Communications Inc.</b>	<b>:</b>	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant)

The Honorable Steven Haas  
Administrative Law Judge  
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DATE: January 3, 2025

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